

United States District Court  
District of Massachusetts  
Eastern Division

CIVIL ACTION NO. 03CV11633 DPW

JT Glover, III, pro se	)
	)
	)
Plaintiff,	)
	)
v.	)
	)
Individuals affiliated with the	)
Massachusetts Department of	)
Mental Retardation-Boston	)
Mr. Gerald Morrissey	)
Mr. Peter Morin	)
Mr. Bernard Murphy	)
Ms. Pam Nicholson	)
Mr. Larry Tummino	)
	)
Defendants.	)
	)

**PLAINTIFF'S ASSENTED TO MOTION TO TRANSFER CIVIL ACTION NO:  
03CV11633-DPW FROM THE US DISTRICT COURT BOSTON DIVISION TO  
THE US DISTRICT COURT SPRINGFIELD DIVISION**

Mr. JT Glover III, on behalf of himself, submits this assented to motion pursuant to local rules 40.1 (F), to transfer the above mentioned civil action case to the US District Court of Springfield.

1. Sometime during the month of September 2003, Mr. Glover conferred with a US District Court staff employee, Ms. Greenberg, regarding the above-mentioned civil action filed in the US District Court of Boston. Mr. Glover and Ms. Greenberg discussed the possibility of eventually transferring this case to the US District of Springfield Division since another complaint, similar in nature, was filed in the Springfield Division as well.

2. Mr. Glover's reasoning filing this complaint in the US District Court of Boston on August 29, 2003 was because it is his belief that specific individuals affiliated with the Department of Mental Retardation of Boston engaged in a deprivation of rights protected by the Constitution of the United States. Mr. Glover wanted to ensure this specific complaint was filed in the appropriate jurisdiction since the above-mentioned defendants reside in the Boston area.
3. On October 15, 2003, via Certified First Class Mail delivery, Mr. Glover provided a verified amended version of this complaint to both the US District Court of Boston and Assistant Attorney General Timothy Jones of the Office of the Attorney General, Western Massachusetts Division.
4. Mr. Glover filed an amended complaint because he wanted to ensure specific employees of the Massachusetts Department of Mental Retardation were not only being sued in their official capacities; but in their individual capacities as well. It was Mr. Glover's wish to cite additional specifics in the amended version of his complaint pursuant to US Title 42 Section 1983; Massachusetts General Laws 19C; and DMR Regulations, 115 CMR 9.00.
5. On October 31, 2003, Mr. Glover and Assistant Attorney General Jones conferred about this matter both agreeing that transferring civil action No. 03CV11633 DPW to the US District Court of Springfield would be beneficial to the plaintiff, the defendants in these cases, and their legal counsel as well. Allowing this transfer would make it easier for legal counsel to conduct activities such as pre-trial conferences, discovery phases including, but not limited to, Depositions, Written Interrogatories, and Requests of Production of Documents in the US District Court of Springfield for both of these cases

Wherefore, for the above mentioned reasons, the plaintiff requests that this court grant his assented to motion to transfer this case to the Springfield Division pursuant to local rules 40.1 (F).

**THE PLAINTIFF,**

By: 

JT Glover, III, pro se

46 Quincy Street #5

North Adams, MA 01247

(413) 664-9093

**Certificate of Service**

I, JT Glover III, herby certify that on November 4, 2003, I served a copy of the foregoing **Plaintiff's Assented to Motion to transfer Civil Action # 03CV11633 DPW from US District Court of Boston to US District Court of Springfield** by First-Class Mail, postage prepaid, upon:

Assistant Attorney General Timothy M. Jones  
Office of the Attorney General  
Western Massachusetts Division  
1350 Main Street  
Springfield, MA 01103-1629

  
JT Glover III